

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**MATTHEW JOHN FISHER, SETH ROSENBERG, by his next friend Ira Rosenberg, JAMES WALTON,**

**Plaintiffs,**

**V.**

**BOROUGH OF DOYLESTOWN,  
POLICE OFFICER JEROLD BREDOW,  
individually and as a police officer of the  
Borough of Doylestown, ROBERT  
WELCH,**

## Defendants.

**CIVIL ACTION**  
**No. 02-CV-4007**

**JUDGE HERBERT J. HUTTON**

## PLAINTIFFS' PROPOSED JURY VERDICT FORM

## Federal Claims

1. Did defendant Bredow arrest plaintiff Matthew Fisher without probable cause in violation of his constitutional rights?

YES

\_\_\_\_\_ NO

2. If you answered "YES" to questions 1, what amount do you award Matthew Fisher as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

3. Did defendant Bredow arrest plaintiff Seth Rosenberg without probable cause in violation of his constitutional rights?

YES

\_\_\_\_\_ NO

4. If you answered "YES" to questions 3, what amount do you award Seth Rosenberg as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

5. Did defendant Bredow arrest plaintiff James Walton without probable cause in violation of his constitutional rights?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

6. If you answered "YES" to questions 5, what amount do you award James Walton as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

### **State Claims**

7. Did defendant Bredow falsely arrest plaintiff Matthew Fisher?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

8. If you answered "YES" to questions 7, what amount do you award Matthew Fisher as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

9. Did defendant Bredow falsely arrest plaintiff Seth Rosenberg?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

10. If you answered "YES" to questions 9, what amount do you award Seth Rosenberg as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

11. Did defendant Bredow falsely arrest plaintiff James Walton?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

12. If you answered "YES" to questions 11, what amount do you award James Walton as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

13. Did defendant Bredow maliciously prosecute plaintiff Matthew Fisher?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

14. If you answered "YES" to questions 12, what amount do you award Matthew Fisher as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

15. Did defendant Bredow maliciously prosecute plaintiff Seth Rosenberg?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

16. If you answered "YES" to questions 15, what amount do you award Seth Rosenberg as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

17. Did defendant Bredow maliciously prosecute plaintiff James Walton?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

18. If you answered "YES" to questions 17, what amount do you award James Walton as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

19. Did defendant Bredow assault plaintiff Matthew Fisher?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

20. Did defendant Bredow commit a battery on plaintiff Matthew Fisher?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

21. If you answered "YES" to questions 19-20, what amount do you award Matthew Fisher as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

22. Did defendant Bredow assault plaintiff Seth Rosenberg?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

23. Did defendant Bredow commit a battery on plaintiff Seth Rosenberg?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

24. If you answered "YES" to questions 22-23, what amount do you award Seth Rosenberg as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

25. Did defendant Bredow assault plaintiff James Walton?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

26. Did defendant Bredow commit a battery on plaintiff James Walton?

\_\_\_\_\_ YES

\_\_\_\_\_ NO

27. If you answered "YES" to questions 25-26, what amount do you award James Walton as compensatory damages?

Answer in dollars or NONE. \_\_\_\_\_.

Respectfully submitted,

DATE: February 6, 2004

/s Michael C. Schwartz

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**CERTIFICATE OF SERVICE**

I, Michael C. Schwartz, hereby certify that, on February 6, 2004, the foregoing Plaintiffs' Pretrial Memorandum was filed electronically, and that copies of said filings were served via first-class U.S. Mail upon counsel for Defendant Bredow:

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